Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
Requests for Comment on	)	CC Docket No. 94-102
Phase I E911 Implementation Issues	)	
	)	

TO: The Commission

COMMENTS OF THE KING COUNTY E911 PROGRAM

The purpose of this letter is to provide comments in response to the Wireless Telecommunications Bureau request related to funding responsibilities for Phase I wireless Enhanced (E911) service. King County filed a letter with the Bureau on May 25, 2000 seeking assistance in this matter, which has resulted in this Bureau request for comment. Although the May 25, 2000 letter contains King County's comments in this matter, we are also filing these additional comments in response to the Bureau's request.

The Bureau asked whether a clearly defined demarcation point exists in the E911 network that separates the responsibilities of carriers and PSAPs. It is King County's viewpoint that the E911 selective router is the demarcation point between carrier and PSAP responsibilities. The E911 selective router has already been established as the demarcation point between the existing E911 system and other telecommunications services. These include Competitive Local Exchange Carrier services and Private Telephone systems. These services provide the network and data base functions necessary to provide their customers with E911 service from their

switches to the E911 selective router, and the interface to the E911 selective router and E911 data base. The PSAPs are then responsible for the E911 selective routing, network, and data base from that point to the PSAPs. This same demarcation point would be appropriate for Phase I service, and any other telecommunications services that are under development or may emerge in the future. Please see the enclosed diagrams for a graphic depiction of this demarcation point for Phase I.

This is especially appropriate since PSAPs do not have input into the technology chosen by the carrier to deliver the service. Regardless of whether CAS or NCAS solutions are chosen by the carriers, they should be responsible for delivering the network necessary for Phase I service to the E911 selective router, performing any data base functions necessary for Phase I service, and interfacing those components to the E911 selective router and the E911 data base to ensure that E911 service is available to their customers. The PSAPs are then responsible for ensuring that the appropriate E911 network, data base, and equipment are in place from the selective router to the PSAPs.

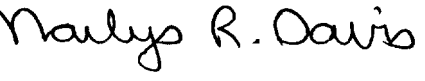
The Bureau asked whether there is a rationale or precedent for a division of costs between carriers and PSAPs based on the implementation of wireline E911 networks. The Bureau specifically requested information on the division of costs between LECs and PSAPs, and whether certain costs associated with Phase I technologies should be borne or shared by the LECs. Technically, the implementation of wireline and wireless E911 service is similar, in that they each require the implementation of network, data base, and selective routing in order for the service to operate. However, the funding mechanism used to support wireline and wireless E911 service is not comparable. As the FCC has pointed out, wireless carriers are unregulated,

competitive carriers. The LECs are regulated carriers who have tariffed rates for E911 service. Their rates are established by the public utilities commission, and PSAPs have the ability to influence those rates when they are set by the commission. The rates are then standard across the state. In Washington State, the PSAPs pay for the selective routing, network, and data base components of the E911 service from the LEC end offices to the PSAPs. Without the ability to regulate the wireless carriers and establish standard rates for service, it is not appropriate to compare the two. In addition, the FCC should be aware that if they impose obligations on the LECs for implementing wireless E911, such as the costs of interfacing Phase I service to the E911 selective router or data base, those costs will undoubtedly be passed on to the PSAPs in the LEC rates. Assigning costs for Phase I service to the LECs will ultimately result in those costs being assigned to the PSAPs.

Thank you for your attention and dedication to resolving issues related to the implementation of this important service. We look forward to further clarification of these issues by the Commission so that we may proceed with the provision of Phase I wireless E911 service to our citizens.

Respectfully submitted,

KING COUNTY E911 PROGRAM



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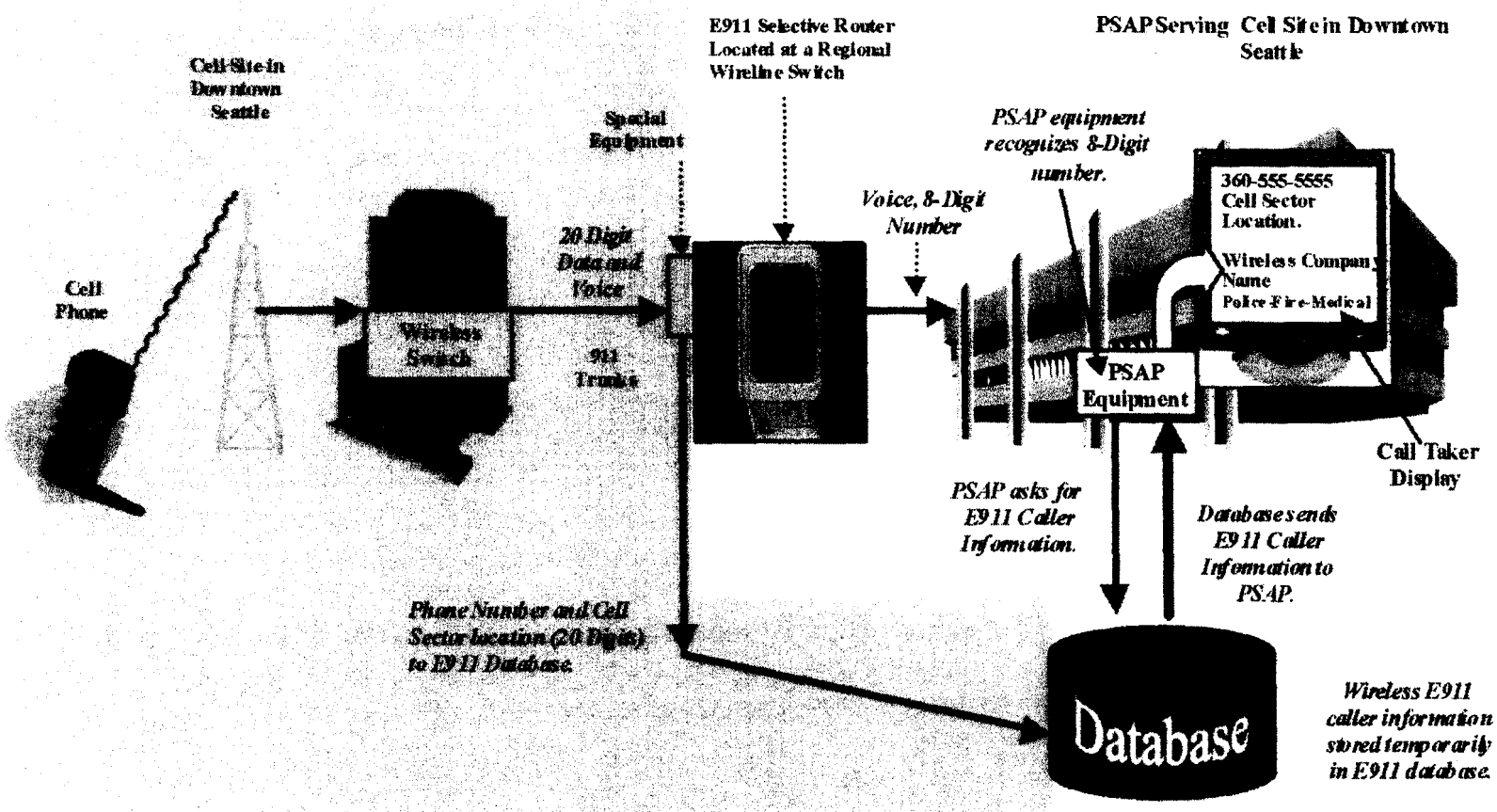
Phase1

Call Associated Signaling

Funding Responsibilities

Wireless Carrier **PSAP**



Phase1

Non-Call Path Associated Signaling

Funding Responsibilities

Wireless Carrier **PSAP**